

**III. REMARKS**

Claims 1-29 are pending in this application. By this amendment, claims 1, 2, 9, 16, 22, 23 and 29 have been amended. These amendments are being made to facilitate early allowance of the presently claimed subject matter. Applicants do not acquiesce in the correctness of the rejections and reserve the right to present specific arguments regarding any rejected claims not specifically addressed. Further, Applicants reserve the right to pursue the full scope of the subject matter of the original claims in a subsequent patent application that claims priority to the instant application. Reconsideration in view of the following remarks is respectfully requested.

Entry of this Amendment is proper under 37 C.F.R. 1.116(b) because the Amendment: (a) places the application in condition for allowance as discussed below; (b) does not raise any new issues requiring further search and/or consideration; and (c) places the application in better form for appeal. Accordingly, Applicants respectfully request entry of this Amendment.

In the Office Action, claims 1, 7-8, 16, 22, and 28 are rejected under 35 U.S.C. §103(a) as allegedly being unpatentable over Barritz (U.S. Patent Pub. No. 2001/0037258 A1), hereinafter "Barritz," in view of Mueller *et al.* (U.S. Patent No. 6,009,398), hereinafter "Mueller," further in view of Graber *et al.* (U.S. Patent No. 5,712,979), hereinafter "Graber," further in view of Boehne *et al.* (U.S. Patent No. 6,434,500), hereinafter, "Boehne," and further in view of Adobe GoLive 5.0 User Guide, (published 2000), hereinafter, "Adobe." Claims 2, 12, 18, 23 and 29 are rejected under 35 U.S.C. §103(a) as allegedly being unpatentable over Barritz in view of Mueller, Graber, Boehne and Adobe, and further in view of Yen *et al.* (U.S. Patent No. 6,724,918 B1), hereinafter "Yen," and further in view of Carrier, III *et al.* (U.S. Patent No. 5,960,196), hereinafter "Carrier, III." Claims 3, 19 and 24 are rejected under 35 U.S.C. §103(a) as allegedly

being unpatentable over Baritz in view of Mueller, Gruber, Boehne and Adobe, and further in view of Stern (U.S. Patent No. 6,724,918), hereinafter "Stern." Claims 4, 20 and 25 are rejected under 35 U.S.C. §103(a) as allegedly being unpatentable over Baritz in view of Mueller, Gruber, Boehne and Adobe, and further in view of Lemay ("Laura Lemay's Teach Yourself Web Publishing with HTML 4 in 14 Days", 1997, Sams.net), hereinafter "Lemay," and further in view of Towers ("Visual Quickstart Guide: Dreamweaver 2 for Windows and Macintosh", 1999, Peachpit Press), hereinafter "Towers." Claims 5, 21 and 26 are rejected under 35 U.S.C. §103(a) as allegedly being unpatentable over Baritz in view of Mueller, Gruber, Boehne and Adobe, and further in view of Conant *et al.* (U.S. Patent Pub. No. 2002/0129056 A1), hereinafter "Conant," and further in view of Busch *et al.* (U.S. Patent No. 6,656,050 B2), hereinafter "Busch," and further in view of Daberko (U.S. Patent No. 5,787,445), hereinafter "Daberko." Claims 6, 17 and 27 are rejected under 35 U.S.C. §103(a) as allegedly being unpatentable over Baritz in view of Mueller, Gruber, Boehne and Adobe, and further in view of Helgeson *et al.* (U.S. Patent No. 6,643,652 B2), hereinafter Helgeson. Claim 9 is rejected under 35 U.S.C. §103(a) as allegedly being unpatentable over Baritz in view of Mueller, Gruber, Boehne, Adobe and Yen. Claims 10-11 are rejected under 35 U.S.C. §103(a) as allegedly being unpatentable over Baritz in view of Mueller, Gruber, Boehne, Adobe, Yen and Helgeson. Claim 13 is rejected under 35 U.S.C. §103(a) as allegedly being unpatentable over Baritz in view of Mueller, Gruber, Boehne, Adobe, Yen, Carrier, III and Stern. Claim 14 is rejected under 35 U.S.C. §103(a) as allegedly being unpatentable over Baritz in view of Mueller, Gruber, Boehne, Adobe, Yen, Carrier, III, Stern, Lemar, and Towers. Claim 15 is rejected under 35 U.S.C. §103(a) as allegedly being unpatentable over Baritz in view of Mueller, Gruber, Boehne, Adobe, Yen, Carrier, III, Stern,

Lemay, Towers, Conant, Busch, and Daberko. Applicants respectfully traverse these rejections for the following reasons indicated below.

**A. REJECTION OF CLAIMS 1, 7-8, 16, 22 AND 28 UNDER 35 U.S.C. §103(a) OVER BARRITZ, MUELLER, GRABER, BOEHNE AND ADOBE**

With regard to the 35 U.S.C. §103(a) rejection over Barritz in view of Mueller, Graber, Boehne and Adobe, Applicants assert that the combined references cited by the Office fail to teach or suggest each and every element of the claimed invention. For example, with respect to independent claims 1, 16 and 22, Applicants respectfully submit that the combined references fail to teach or suggest, *inter alia*, the categories, the creator group, the content, the relationship, the calendar, the breadcrumb code, and the feedback mechanism of the website are adapted to be developed by a creator that has no knowledge of web-based programming. The Office admits that Barritz fails to disclose the website being adapted to be developed by a creator that has no knowledge of web-based programming. Final Office Action, page 3. Instead, the Office relies on Adobe, which it asserts discloses the website being adapted to be developed by a creator that has no knowledge of web-based programming. Final Office Action, page 3. However, the passage of Adobe cited by the Office does not teach that the software may be used to create categories, a creator group, content, relationships, a calendar, breadcrumb code and a feedback mechanism within a website without the creator having knowledge of web-based programming. In contrast, the claimed invention includes "...wherein the content, the relationship, the calendar, the breadcrumb code, and the feedback mechanism of the website are adapted to be developed by a creator that has no knowledge of web-based programming. Claim 1. As such, in contrast to the generic statement of Adobe, the claimed invention allows specific elements of the website to be

developed by a creator that has no knowledge of web-based programming. Thus, Adobe GoLive does not teach the website development of the claimed invention. None of Mueller, Graber and Boehne cures this deficiency. Accordingly, Applicants respectfully request that the rejection be withdrawn.

With further respect to independent claim 16, Applicants respectfully submit that the combined references fail to teach or suggest, *inter alia*, that the creator groups include creators chosen from the group consisting of: authors who prepare the content for posting to the website, editors who edit the content submitted by the authors and administrators who approve the content. The Office equates the author, editor and administrator of the claimed invention with the publisher, web designer and web programmer, respectively, of Adobe. However, the publisher of Adobe does not prepare the content for posting to the website. Furthermore, the web designer of Adobe does not edit the content submitted by the publisher. Still further, the web programmer of Adobe does not approve the content. In contrast, the claimed invention includes "...wherein the creator groups include creators chosen from the group consisting of: authors who prepare the content for posting to the website, editors who edit the content submitted by the authors and administrators who approve the content." Claim 16. To this extent, the creator groups of the claimed invention are not merely the publisher, web designer, and web programmer of Adobe. Thus, Adobe does not teach or suggest the creator groups of the claimed invention. None of Barritz, Mueller, Graber, and Boehne cure this deficiency. Accordingly, Applicants respectfully request that the Office withdraw its rejection.

**B. REJECTION OF CLAIMS 2, 12, 18 23 AND 29 UNDER 35 U.S.C. §103(a) OVER BARRITZ, MUELLER, GRABER, BOEHNE, ADOBE, YEN, AND CARRIER III**

With regard to the 35 U.S.C. §103(a) rejection over Barritz in view of Mueller, Graber, Boehne, Adobe, Yen, and Carrier III, Applicants assert that the combined references cited by the Office fail to teach or suggest each and every element of the claimed invention. For example, with respect to claims 2 and 23, Applicants respectfully submit that the combined references fail to teach or suggest, *inter alia*, a category system for defining the categories into which content is arranged and assigning creator groups thereto, wherein the content for the categories can be defined only by the assigned creator groups. The Office admits that Barritz, Mueller, Graber and Boehne fail to teach this feature. Instead, the Office relies on a passage of Yen, which describes an editing mode that allows a client to add sketch information to a retrieved document as well as recording "...audio and/or video information to contribute to collaborative creation of a document." Col. 5, lines 35-55. To this extent, the client in Yen is allowed to contribute to the creation of the entire document and is not limited to a particular category or section of the document.

Furthermore, Yen defines the sketch information that the client is allowed to contribute as "...created as an independent element of a more complex free hand drawing and/or to encircle or underline a feature of a background image that is displayed by the system in the viewable area." Col. 8, lines 8-11. As such, Yen does not allow its client unlimited access for defining content in a particular section, but instead only allows the client overlay access, such as for creating a freehand drawing or encircling or underlining an existing feature. Still further, Yen never teaches or suggests that only members of a creator group may define content but rather teaches that there is a pre-existing feature that may be underlined or encircled.

The claimed invention, in contrast, includes "...a category system for defining the categories [into which content is arranged] and assigning creator groups thereto, wherein the content for the categories can be defined only by the assigned creator groups." Claim 1. As such, the creator groups of the claimed invention do not simply draw upon, encircle, or underline content that has been previously created by another as in Yen, but instead only the assigned creator groups can define the content. In addition, the category system of the claimed invention defines categories, the content for which can only be defined by the assigned creator groups, as opposed to Yen in which the client contributes to the content of the entire document. For the above reasons, the category system of the claimed invention is not taught or suggested by the editing mode of Yen. None of Baritz, Mueller, Gruber, Boehne, Adobe and Carrier III cures this deficiency. Accordingly, Applicants respectfully request that the rejection be withdrawn.

With further respect to claims 2 and 23, Applicants respectfully submit that, as argued above with respect to independent claim 16, the cited references fail to teach or suggest, *inter alia*, that the creator groups include creators chosen from the group consisting of: authors who prepare the content for posting to the website, editors who edit the content submitted by the authors and administrators who approve the content. In addition, with respect to the Yen reference, Applicants submit that, as argued above, Yen teaches a client that may add sketch information and record audio and/or video information to contribute to collaborative creation of a document. Yen, however, never teaches that a client may be an author, an editor, or an administrator. In contrast, the claimed invention includes "...wherein the creator groups include creators chosen from the group consisting of: authors who prepare the content for posting to the website, editors who edit the content submitted by the authors and administrators who approve

the content." Claim 2. To this extent, the creator groups of the claimed invention are not merely generic clients as in Yen, but instead include creators chosen from the group consisting of: authors, editors and administrators. Thus, Yen does not teach or suggest the creator groups of the claimed invention. None of Mueller, Graber, Boehne, Adobe and Carrier III cure this deficiency. Accordingly, Applicants respectfully request that the Office withdraw its rejection.

**C. REJECTION OF CLAIMS 3-6, 9-11, 13-15, 17, 19-21 and 24-27 UNDER 35 U.S.C. §103(a)**

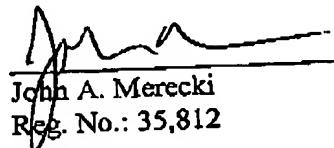
With regard to the Office's other 35 U.S.C. §103(a) rejections, Applicants submit that the combined features of the cited art fail to teach each and every feature of the claimed invention. For example, with respect to independent claim 9, as argued above with respect to independent claims 1, 16 and 22, the cited references fail to teach or suggest a category system for defining the categories into which content is arranged and assigning creator groups thereto, wherein the content for the categories can be defined only by the assigned creator groups. With further respect to independent claim 9, as argued above with respect to independent claim 16 and dependent claims 2 and 23, the cited references fail to teach or suggest, *inter alia*, that the creator groups include creators chosen from the group consisting of: authors who prepare the content for posting to the website, editors who edit the content submitted by the authors and administrators who approve the content. With still further respect to independent claim 9, as argued above with respect to dependent claims 2 and 23, the cited references fail to teach or suggest, *inter alia*, a category system for defining the categories into which content is arranged and assigning creator groups thereto, wherein the content for the categories can be defined only by the assigned creator groups. Accordingly, Applicants respectfully request that the Office withdraw its rejection.

With regard to the Office's other arguments regarding dependent claims, Applicants herein incorporate the arguments presented above with respect to independent claims listed above. In addition, Applicants submit that all defendant claims are allowable based on their own distinct features. However, for brevity, Applicants will forego addressing each of these rejections individually, but reserve the right to do so should it become necessary. Accordingly, Applicants respectfully request that the Office withdraw its rejection.

#### IV. CONCLUSION

Applicants respectfully submit that the application is in condition for allowance. Should the Examiner believe that anything further is necessary to place the application in better condition for allowance, he is requested to contact Applicants' undersigned attorney at the telephone number listed below.

Respectfully submitted,

  
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